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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL
RECORDS, LLC, CONCORD BICYCLE
ASSETS, LLC, CMGI RECORDED
MUSIC ASSETS LLC, SONY MUSIC
ENTERTAINMENT, and ARISTA MUSIC,

Plaintiffs,

v.

INTERNET ARCHIVE, BREWSTER
KAHLE, KAHLE/AUSTIN
FOUNDATION, GEORGE BLOOD, and
GEORGE BLOOD L.P.,

Defendants.

CASE No. 3:23-cv-06522-MMC

**DEFENDANTS' ADMINISTRATIVE MOTION
TO CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE SEALED**

Pursuant to Civil Local Rule 79-5(f), and in accordance with the Stipulated Protective Order (Dkt. 113) (“Protective Order”), Defendants Internet Archive, Brewster Kahle, Kahle/Austin Foundation, George Blood, and George Blood L.P. (“Defendants”) respectfully submit this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”).

The documents subject to this Motion are as follows:

Document to Be Sealed	Designating Party	Reason(s) for Sealing
Contract produced by Sony Music Entertainment, Exhibit 2 (Bates No. PL0000001575)	Sony Music Entertainment	Material designated by Plaintiffs as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order.
Contract produced by Sony Music Entertainment, Exhibit 3 (Bates No. PL0000001578)	Sony Music Entertainment	Material designated by Plaintiffs as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order.

As set forth above, Exhibits 2 and 3 to the Declaration of Allison L. Stillman filed in support of Defendants’ Opposition to Plaintiffs’ Motion for Leave to File the Second Amended Complaint contain material designated as “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order. Defendants take no position on whether the material so designated is confidential or otherwise entitled to sealing, but submit this Administrative Motion in order to comply with the Protective Order and L.R. 79-5(f). Exhibits 2 and 3 will be submitted provisionally under seal with this Administrative Motion, subject to Plaintiffs’ filing of a statement and/or declaration pursuant to L.R. 79-5(f)(3).

1 Dated: March 20, 2025

Respectfully submitted,

2 **LATHAM & WATKINS LLP**

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